

October 25, 2002

10 CFR 50.55a(a)(3)

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Stop: OWFN P1-35
Washington, D.C. 20555-0001

Gentlemen:

In the Matter of) Docket No. 50-260
Tennessee Valley Authority)

**BROWNS FERRY NUCLEAR PLANT (BFN) - UNIT 2 - AMERICAN SOCIETY
OF MECHANICAL ENGINEERS (ASME) SECTION XI, INSERVICE INSPECTION
(ISI) PROGRAM - REQUEST FOR RELIEF 2-ISI-13, EXAMINATION AND
TESTING OF SNUBBERS**

This letter requests NRC review of BFN Unit 2 request for relief 2-ISI-13 regarding the examination and testing of snubbers. TVA submitted this request for relief in the BFN Unit 2, Third Ten-Year Interval ISI Program, by letter dated February 5, 2001. NRC letter dated February 4, 2002 (TAC No. MB0400), transmitted the Safety Evaluation (SE) for the BFN Unit 2 ISI Program and associated requests for relief. However, the SE did not include an evaluation for request for relief 2-ISI-13.

Relief request 2-ISI-13 is consistent with request for relief 3-ISI-2 for the BFN Unit 3, Second Ten-Year Interval ISI Program submitted by TVA letters dated January 22, 1997, and October 29, 1998. NRC approved the request for relief by letter dated May 3, 1999.

The enclosure to this letter provides a copy of request for relief 2-ISI-13. TVA seeks review of this request for relief by February 3, 2003, to support resource planning for the Unit 2 Cycle 12 (Spring 2003) refueling outage.

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There are no new commitments contained in this letter. If you have any questions, please contact me at (256) 729-2636.

Sincerely,

original signed by:

T. E. Abney
Manager of Licensing
and Industry Affairs

cc: See Page 3

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Enclosure

cc (Enclosure):

(Via NRC Electronic Distribution)

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Enclosure

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ENCLOSURE

TENNESSEE VALLEY AUTHORITY
BROWNS FERRY NUCLEAR PLANT (BFN)
UNIT 2
ASME SECTION XI INSERVICE INSPECTION PROGRAM
(THIRD TEN-YEAR INSPECTION INTERVAL)

REQUEST FOR RELIEF 2-ISI-13,
EXAMINATION AND TESTING OF SNUBBERS

(See Attached)

TENNESSEE VALLEY AUTHORITY
BROWNS FERRY NUCLEAR PLANT (BFN)
UNIT 2
ASME SECTION XI INSERVICE INSPECTION PROGRAM
(THIRD TEN-YEAR INSPECTION INTERVAL)

REQUEST FOR RELIEF 2-ISI-13,
EXAMINATION AND TESTING OF SNUBBERS

Executive Summary: Pursuant to 10 CFR 50.55a(a)(3)(i), TVA is requesting relief from the identified ASME Section XI Code requirements related to examination and testing of snubbers. TVA proposes to continue to use the examination and testing plans currently defined in the BFN Technical Requirements Manual (TR 3.7.4). The current Technical Requirements Manual was developed in accordance with the guidance provided in Generic Letter (GL) 90-09 and has been promulgated and approved by the NRC, while ASME Section XI imposes overlapping requirements which do not enhance the quality or safety of the snubber examination and testing program.

Unit: Two (2)

System: Various

Components: Component/Piping Snubbers

ASME Code Class: 1, 2, and 3

Section XI Edition: 1995 Edition, 1996 addenda

Code Table: N/A

**Examination
Category:** N/A

**Examination Item
Number:** N/A

**Requirement From
Which Relief Is
Requested:**

The 1995 Edition, 1996 Addenda of ASME Section XI, Article IWF-1000 provides the requirements for inservice inspection (ISI) of Class 1, 2, 3, and MC component supports. This includes the visual examination of snubbers. Article IWF-5000 contains the inservice test requirements (IST) for snubbers.

Basis For Relief:

ASME Section XI, Class 1, 2, and 3 equivalent snubbers are examined and tested in accordance with BFN Plant Technical Requirements Manual (TRM), TR 3.7.4. The TRM is prepared in accordance with the guidance provide by the NRC in GL 90-09. The scope for snubbers examined and tested in accordance with TR 3.7.4 is not limited by line size or other applicable code exemptions and includes a numerically greater population of snubbers than the Section XI program. Examination and testing of the snubbers in accordance with both ASME Section XI, and the plant TRM would result in a duplication of effort utilizing different standards and require the preparation of a separate program and associated procedures. This would result in additional cost and unnecessary radiological exposure. In addition, the personnel performing snubber visual examination would also be required to be certified in accordance with the American Society of Nondestructive Testing (ASNT) SNT-TC-1A "Personnel Qualification and Certification in Nondestructive Testing" and/or ANSI/ASNT CP-189. This is an additional qualification and certification as compared to the task training qualification required to perform the TRM required examinations and testing of snubbers. The existing TRM program for examination and testing of snubbers was promulgated and accepted by the NRC.

Implementing the ASME Section XI, 1995 Edition, 1996 Addenda would be a

duplication of an existing program accepted by the NRC without a compensating increase in the level of quality and safety.

**Alternative
Examination:**

The BFN TRM, TR 3.7.4, requirements, meeting the guidance of GL 90-09, will be utilized for the examination and testing of snubbers for preservice, inservice, and repairs/replacement activities. The implementing procedures utilized for these examinations are:

2-SI-4.6.H-1, "Visual Examination of Hydraulic and Mechanical Snubbers"

0-SI-4.6.H-2A, "Functional Testing of Mechanical Snubbers"

0-SI-4.6.H-2B, "Functional Testing of Bergen-Patterson Hydraulic Snubbers"

0-SI-4.6.H-2C, "Functional Testing of Bergen-Patterson Torus Dynamic Restraints"

0-SI-4.6.H-2D, "Functional Testing of Grinnell Hydraulic Snubbers"

0-SI-4.6.H-2E, "Functional Testing of Lisega Large Bore Torus Dynamic Restraint Snubbers"

MPI-0-000-SNB-002, "Hydraulic Shock and Sway Arrestor Bergen-Patterson Unit Disassembly and Reassembly"

MPI-0-000-SNB-004, "Instructions for Removing and Reinstalling Pacific Scientific Mechanical, Bergen-Patterson Grinnell Hydraulic, and Torus Dynamic Restraints"

This will include the pin-to-pin area inclusive of applicable snubbers. Testing of repaired and replaced snubbers will also be performed in accordance with TR 3.7.4.

Visual examination of repaired and replaced snubbers will be performed in accordance with MPI-0-000-SNB-004, "Instructions for Removing and Reinstalling Pacific Scientific Mechanical, Bergen-Patterson Grinnell Hydraulic, and Torus Dynamic Restraints." Snubber examination and testing data will be maintained in accordance with the requirements of TR 3.7.4, the site corrective action program, SPP-3.1, and the implementing procedures (2-SI-4.6.H-1, 0-SI-4.6.H-2A, 0-SI-4.6.H-2B, 0-SI-4.6.H-2C, 0-SI-4.6.H-2D, 0-SI-4.6.H-2E, MPI-0-000-SNB-002, and MPI-0-000-SNB-004).

The areas inclusive of the pins, back to the building structure and to the component/piping being supported, will remain in the ASME Section XI examination boundary (ISI Program).

**Justification For
The Granting Of
Relief:**

The current program, as defined by TR 3.7.4, provides for a level of quality and safety equal to or greater than that provided by ASME/ANSI OM, Part 4, ASME Section XI Code 1995 Edition, 1996 Addenda requirements. The current program, as defined by TR 3.7.4, utilizes NRC guidance not included in the 1995 Section XI.

Examination, testing, repair and replacement of snubbers is currently performed in accordance with TR 3.7.4, which utilizes the guidance provided by NRC GL 90-09. ASME Section XI, 1995 Edition, 1996 Addenda has a different basis for the examination and testing plans. It is impractical to implement the requirements of both programs because of the resulting duplication of examination and testing efforts; e.g., different requirements for snubber quantities subject to examination or test; actually examined and/or tested and sample expansion requirements. This would result in additional cost and unnecessary

radiological exposure. The existing TRM program for examination and testing of snubbers has been promulgated and accepted by the NRC. The difference in the two programs could create confusion when selecting test samples, applying acceptance criteria, corrective actions, and examination schedules for failed snubbers. This situation would increase the possibility of applying the wrong action due to conflicting requirements thus creating a nonconformance condition, an in-operability or even a violation of a TRM requirement.

To eliminate any misinterpretation or confusion in administering overlapping requirements for snubbers, and to remove the possibility of applying contradicting requirements to the same snubber(s), BFN proposed to examine and test snubbers in accordance with BFN TR 3.7.4.

Subarticle IWF-5400 of the 1995 Edition, 1996 Addenda of the code provides the requirements for repair and replacement of snubbers to be in accordance with IWA-4000. IWF-5200 provides that examinations shall be performed in accordance with ASME/ANSI OM, Part 4. This program requires replacement snubbers and snubbers that have repairs which might affect the functional test results, to be tested to meet the functional test criteria prior to installation.

Maintenance procedure MPI-0-000-SNB-004 provides visual examination criteria for installation of a snubber after repair or replacement. The ASME Section XI repair/replacement program at BFN documents the verification of acceptability for repairs and replacements per IWA-4160.

ASME Section XI VT-3 certification required by personnel performing snubber visual examinations is an additional certification as compared with the TRM

program training qualifications. Personnel performing the TRM required visual examinations are "process qualified" to perform the examinations and testing as required by the TRM and implemented by the referenced procedures. This training currently includes a visual test associated with face mask fit and specific training on the requirements and acceptance criteria associated with the applicable procedures. Additional "visual acuity" verification for personnel performing snubber visual examinations will include visual acuity requirements that meet ASME Section XI. The training and documentation of personnel to the visual acceptance criteria specified in the TRM implementing procedures provides an acceptable level of quality and safety.

Since relief is sought from the ASME Section XI snubber examination and test requirements there will be no ASME Section XI snubber examination and test activities to require ANII involvement. The BFN TRM snubber program does not require the use of an ANII for examination and test requirements. The ANII will not be involved in the TRM required visual examination or testing activities performed in lieu of the ASME Code requirements. A snubber program manager provides the oversight of the TRM snubber program implementation for both the visual examination and functional testing. This oversight includes both review and evaluation of visual examination and functional testing data to ensure TRM requirements are met. The snubber program manager provides the oversight that ensures an acceptable level of quality and safety exist without ANII involvement in these activities. ANII involvement will be maintained in inservice repair and replacement snubber activities, as required by IWA-2110(g) and (h) and implemented by BFN's ASME Section XI repair and replacement program.

ASME Section XI, 1995 Edition, 1996 Addenda Subarticle IWA-6230 provides requirements for ISI and IST documentation for snubbers in the framework of a summary report. Under the alternate requirements for snubbers, there will be no ASME Section XI ISI and IST to document in a summary report. TR 3.7.4 is implemented by surveillance instructions 2-SI-4.6.H-1, 0-SI-4.6.H-2A, 0-SI-4.6.H-2B, 0-SI-4.6.H-2C, 0-SI-4.6.H-2D, and 0-SI-4.6.H-2E and maintenance instructions MPI-0-000-SNB-002, and MPI-0-000-SNB-004. These instructions are written and approved in accordance with the TVA Nuclear Quality Assurance Program. They include data sheets for documenting the visual examination and functional test data and results, provide for documentation of nonconforming results and evaluation of those results. The completed data sheets are QA records and are controlled and maintained in accordance with the BFN QA records program. These records are available onsite for review and inspection. The alternate ISI and IST program, including the generated QA records documenting snubber ISI and IST provides an acceptable level of quality and safety when compared to the requirements of ASME Section XI, 1995 Edition 1996 Addenda.

Based on the justification provided, BFN's examination and testing of snubbers, in accordance with TR 3.7.4 will provide an acceptable level of quality and safety. Therefore, pursuant to 10 CFR 50.55a(a)(3)(i), TVA requests that relief be granted from the ASME Section XI, 1995 Edition, 1996 Addenda requirements related to ISI and IST of snubbers.

TVA's relief is consistent with request for relief 3-ISI-2 submitted by TVA letters dated January 22, 1997, and October 29, 1998, for the BFN Unit 3

Second Ten-Year Inservice Inspection Interval. The NRC staff approved the request for relief by letter dated May 3, 1999.

Implementation
Schedule:

This request for relief is applicable to the Third Ten-Year Inservice Inspection Interval for BFN Unit 2.